

AO 106 (REV 4/10) Affidavit for Search Warrant

AUSA Aaron R. Bond, (312) 469-6047

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

FILED

In the Matter of the Search of:

Case Number:

JAN 4 2018

JAN 4, 2018

18M10

Magistrate Judge Sidney I. Schenkier  
United States District Court

the US Express Mail package bearing tracking  
number EL923362988US, further described in  
Attachment A

**APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT**

I, Kevin Hegi, a Postal Inspector of the U.S. Postal Inspection Service, request a search warrant and state  
under penalty of perjury that I have reason to believe that in the following package:

**See Attachment A**

located in the Northern District of Illinois, there is now concealed:

**See Attachment B**

The basis for the search under Fed. R. Crim. P. 41(c) is evidence, instrumentalities, and contraband.

The search is related to a violation of:

*Code Section*

Title 21, United States Code, Section 843(b)

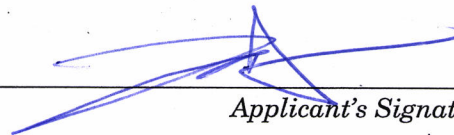
*Offense Description*

narcotics

The application is based on these facts:

**See Attached Affidavit,**

Continued on the attached sheet.



*Applicant's Signature*

KEVIN HEGI, Postal Inspector, U.S. Postal Inspection Service

*Printed name and title*

Sworn to before me and signed in my presence.

Date: January 4, 2018

City and State: Chicago, Illinois



*Judge's signature*

SIDNEY I. SCHENKIER, U.S. Magistrate Judge

*Printed name and title*

UNITED STATES DISTRICT COURT       )  
  )  
NORTHERN DISTRICT OF ILLINOIS       )

**AFFIDAVIT**

I, Kevin Hegi, being duly sworn, state as follows:

1. I am a Postal Inspector with the U.S. Postal Inspection Service. I have been so employed since approximately February 2017.

2. As part of my duties as a USPS Postal Inspector, I investigate criminal violations relating to violations of the federal laws relating to the mails and to controlled substances.

3. This affidavit is made in support of an application for a warrant to search the US Express Mail Parcel with Tracking Number EL923362988US described further in Attachment A (the "**Subject Parcel**"), for evidence, instrumentalities, and contraband described further in Attachment B, concerning narcotics offenses, in violation of Title 21, United States Code, Section 843(b).

4. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to establish probable cause to believe that evidence,

instrumentalities, and contraband of violations of Title 21, United States Code, Section 843(b), are located within the **Subject Parcel**.

**I. FACTS SUPPORTING PROBABLE CAUSE TO SEARCH THE SUBJECT PARCEL**

5. On January 3, 2018, I inspected the **Subject Parcel** at USPS JT Weeker International Service Center in Chicago, Illinois. The **Subject Parcel** was mailed on January 3, 2018, from Rockford, 61125 and is addressed to "Steve Pham 692 Gardenia Dr Azusa, Ca 91702," with a return address of "Alexis Galvez 3404 Michael dr. 61108 Rockford IL." The **Subject Parcel** bears \$40.15 in postage, measures approximately 11.25 inches x 8.75 inches x 6 inches, and weighs approximately 1 pound 12 ounces.

6. I observed characteristics about the **Subject Parcel** that, in my training and experience, can be consistent with parcels containing a controlled substance.

7. First, cash was utilized to pay postage on the **Subject Parcel**. In my training and experience, drug traffickers often utilize cash to pay for postage in order to avoid association with the parcel.

8. Second, a search of law enforcement databases revealed that the listed recipient, Steve Pham, has prior arrests for possession of controlled substances and had a recent narcotics-related arrest from 2017.

9. The characteristics I describe above can be consistent with parcels that do not contain contraband.



10. On January 4, 2018, I arranged for a United States Customs and Border Protection Canine Officer and his canine partner, "Perro," to meet with me and examine the **Subject Parcel**. According to the Canine Officer, Perro is certified annually by United States Customs and Border Protection as a narcotics dog. Perro was most recently re-certified on February 6, 2017. Perro is trained to sniff buildings, vehicles, envelopes, and wrapped parcels to detect the odors of heroin, cocaine, marijuana, hash, methamphetamine, ecstasy, and other controlled substances that could be contained inside. Perro is also trained to indicate the presence of such substances or their scents by alerting to the item he is sniffing. In addition, according to USPIS records, Perro has successfully alerted to controlled substances in U.S. Mail Parcels and letters on 166 occasions since July 2013, with a success rate of approximately 91%. To the best of my knowledge, U.S. Customs and Border Protection does not maintain records regarding the overall success rate for its drug detection dogs, and therefore only the USPIS success rate is available.

11. On January 4, 2018, at the Postal Service International Service Center at O'Hare Airport in Chicago, Illinois, I arranged a controlled substance detection test by placing the **Subject Parcel** among approximately 20 other parcels in the workroom area. I then witnessed Perro examine the parcels and observed Perro alert by sitting next to the **Subject Parcel**. Perro did not alert to any of the other parcels. The Canine Officer informed me that Perro's actions indicated the presence of

narcotics and/or controlled substances in the **Subject Parcel**. I then took custody of the **Subject Parcel**.

## II. CONCLUSION

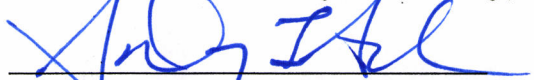
12. Based on the above information, I respectfully submit that there is probable cause to believe that narcotics offenses, in violation of Title 21, United States Code, Section 843(b), have been committed, and that evidence, instrumentalities, and contraband relating to this criminal conduct, as further described in Attachment B, will be found in the **Subject Parcel**, as further described in Attachment A. I therefore respectfully request that this Court issue a search warrant for the **Subject Parcel** more particularly described in Attachment A, authorizing the seizure of the items described in Attachment B.

FURTHER AFFIANT SAYETH NOT.



Kevin Hegi  
Postal Inspector  
U.S. Postal Inspection Service

Subscribed and sworn  
before me this 4th day of January, 2018



Honorable SIDNEY I. SCHENKIER  
United States Magistrate Judge

**ATTACHMENT A**

**DESCRIPTION OF ITEM TO BE SEARCHED**

The US Express Mail Package with Tracking Number EL923362988US, bearing a return address of "Alexis Galvez 3404 Michael dr. 61108 Rockford IL" a recipient address of "Steve Pham 692 Gardenia Dr Azusa, Ca 91702." The **Subject Parcel** weighs approximately 1 pound and 12 ounces, is approximately 11.25 inches x 8.75 inches x 6 inches in size, and bears \$40.15 in postage.

**ATTACHMENT B**

**LIST OF ITEMS TO BE SEIZED**

Evidence, instrumentalities and contraband concerning violation of Title 21,  
United States Code, Section 843(b), as follows:

1. Controlled substances;
2. Packaging for controlled substances;
3. United States Currency, which constitutes evidence or  
instrumentalities of the Subject Offense;
4. Items that identify the sender or receiver of the **Subject Parcel**.



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Matter of the Search of:

Case Number:

the US Express Mail package bearing tracking  
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Attachment A

18M10

**SEARCH AND SEIZURE WARRANT**

To: Kevin Hegi and any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of  
the following person or property located in the Northern District of Illinois:

**See Attachment A**

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person  
or property described above, and that such search will reveal:

**See Attachment B**

**YOU ARE HEREBY COMMANDED** to execute this warrant on or before January 18, 2018 in the daytime  
(6:00 a.m. to 10:00 p.m.).

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property  
taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the  
place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an  
inventory as required by law and promptly return this warrant and inventory to the issuing United States Magistrate  
Judge.

Date and time issued: January 4, 2018 At 3:30 PM

  
Judge's signature

City and State: Chicago, Illinois

SIDNEY I. SCHENKIER, U.S. Magistrate Judge  
Printed name and title



AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

**Return**

Case No:

Date and Time Warrant Executed:

Copy of Warrant and Inventory Left With:

Inventory made in the presence of:

Inventory of the property taken and name of any person(s) seized:

**Certification**

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Executing officer's signature*\_\_\_\_\_  
*Printed name and title*

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